



## 7.0 Local Fire Agency Notification

The contract work scope for this study required an analysis of the feasibility of pipeline operators notifying local affected fire agencies of their pipeline contents and any changes in the hazardous liquids being transported. Existing pipelines would fall into two categories if these requirements should become law:

- Pipelines which carry a single type of fluid - These lines would only require a single notification of the local fire agencies. Most operators already include this notification in their public awareness programs. Many operators forward a copy of their Thomas Guide map book overlays to each local fire agency. These overlays show the location of the hazardous liquid pipelines and often show their contents as well.

- Pipelines which periodically have changes of their contents - These lines would require the operators to notify local fire agencies each time the contents changed. For a pipeline traversing several different local fire agency jurisdictions, each fluid change would require a number of notifications.

Intrastate lines which carry a single type of fluid are already required to meet these requirements; current state law states that, "Every pipeline operator shall provide to the fire department having fire suppression responsibilities a map or suitable diagram showing the location of the pipeline, a description of all products transported within the pipeline, and a contingency plan for pipeline emergencies which shall include but not be limited to any reasonable information which the State Fire Marshal may require."

This section reviews the feasibility of pipeline operators notifying local affected fire agencies when their pipeline contents change.

### 7.1 Questionnaire Development

Initially, each pipeline operator was queried regarding the type of fluids being transported through each of their regulated pipelines. The following table summarizes the number of lines associated with each type of fluid transported. The data indicates that roughly one-third of the pipelines carry some combination of fluids which would require frequent notification of local fire agencies.

Contents Transported	Contents Code	Number of Line Sections
Crude Oil Only	1	165
Light Refined Petroleum Products	2	29
Heavy Refined Petroleum Products	3	170
HVL (e.g., Propane, Butane, LPG, NGL, etc.)	4	7



Combination of Codes 2 and 3	5	163
Any Combination Including HVL's	6	30
Other	7	5
Total Line Sections	-	569

In order to analyze the impact of notifying local fire agencies each time the fluid contents change within a pipeline change, a questionnaire was developed. Four pipeline operators were selected to participate in this portion of the study. The operators were selected to comprise a fairly representative sample of pipeline operators. Data gathered from these operators included:

- frequency of fluid content changes,
- average batch size,
- the pipeline operator's assessment of the impact of a requirement for reporting each fluid contents change to the local fire agencies, and
- the number of Fire Departments which would have to be notified of each change.

## 7.2 Operators' Responses

The following table summarizes the responses gathered from the pipeline operators.

Company	No. of Line Sections Surveyed	Average Fluid Change Frequency Per Section	Average Batch Size	Average Number of Fire Departments To Contact	Operator Comments
Company 1	3	2/month	412,000 barrels	3	Small number of lines with fairly infrequent product changes. Therefore, the impact would be small. However, the requirement to notify would tax an already burdened staff.
Company 2	3	10/month	19,000 barrels	9	Would need additional personnel to make the "phone calls" to notify the Fire Department. Suggest using a computerized method to transmit data. This would require the Fire Departments to install compatible equipment to receive data.



Company 3	6	18/month	55,000 barrels	3	Operator would require additional staff to make the phone calls and gather data to submit to the Fire Departments. They would prefer a computerized system which would be compatible with the system they now have in place for documenting pipeline transport activity.
Company 4	23	4/month	20,000 barrels	6	Operator feels it is "unrealistic" to require the operators to provide the product change information to the Fire Departments. Considering the number of pipelines which are operated and the number of fluid contents changes occurring, this could amount to a significant task. Additional personnel would be required along with the associated overhead. The operator feels that the Fire Departments would not be able to handle the anticipated flow of data.

### 7.3 Fire Departments' Responses

The following table presents comments from a representative sample of Fire Departments that were interviewed. The sample was comprised of Fire Departments that had a large amount of pipeline activity within their area. The seven city and county fire departments surveyed all had similar responses concerning pipeline fluid contents notification. *All of the departments surveyed indicated that the data received would not be a useful "day-to-day" tool. They emphasized that knowing the pipeline contents was only important at the time or a leak and/or fire.*

On average, we estimate that each fire department would receive about 5 notifications for each operating pipeline with fluid content changes per month. Naturally, the number of notification calls would vary significantly between various departments. The table below summarizes comments from the fire departments included in our sampling.



# California State Fire Marshal

March 1993

## Hazardous Liquid Pipeline Risk Assessment

Fire Department	Representative	Comments
Long Beach Fire Department	Inspector Hayes Fire Prevention Section (213) 590-2560	<i>Initial response indicated that the data generated by the notification proposed by the CSFM would not be useful. More significant would be the ability to handle the flow of data from all of the operators on a daily basis. The Long Beach Fire Dept. currently maintains contingency plans which details all information regarding the pipelines. This information includes a list of all products that would be transported through the pipelines. These contingency plans are updated yearly or sooner if a change occurs. From the Department's perspective, in the event of a leak/rupture/fire, the last priority is to know the specific kind of product that is involved. This would be <u>after</u> control and containment (of the "hazardous material") is achieved.</i>
Los Angeles City Fire Department	Floor Captain Operations Control Division (213) 485-6185	<i>The Operations Control Division would not consider taking this data. They do not feel it is a necessary part of the day-to-day operations. The flow of information is more useful and timely at the occurrence of an event. Like the Long Beach Fire Dept., The LA City Fire Dept., relies on information contained within contingency plans regarding all pipelines. These plans are maintained continuously.</i>
Los Angeles County Fire Department	Captain Jim Lyall Petroleum Section (213) 887-6660	<i>The LA County Fire Dept. sees no useful application in receiving this product notification data. They currently follow the guidelines as stipulated in their county Regulation 20 which requires all operators of pipelines to provide detailed information. This information is updated yearly or sooner if there is a change. This notification approach is viewed as an "overkill".</i>
Kern County Fire Department	Fire Captain's Office (805) 861-2577	<i>The Kern County Fire Department could not handle the influx of product notification data if mandated for the operators. They also see no "need-to-know" requirement for such data. Additional personnel would be required to handle such a requirement, considering the high activity rate within the county. The Kern County Fire Department currently maintains an operator list which has a list of contacts and information on the physical details of the pipelines.</i>
San Bernardino County Fire Department	Inspector Mike Huddleston (714) 356-3417	<i>Initial response indicated that they had no need for such data. Their opinion was such that the amount of data flow would be overwhelming, requiring additional manpower and support to handle. They see no need for such data on a day-to-day basis, and find the information relevant <u>only</u> when there is an occurrence of a leak or other such event. Current Fire Department procedure is considered adequate.</i>
Bakersfield Fire Department	Larry Toler Fire Marshal Fire Safety Control Section (805) 326-3911	<i>The Bakersfield Fire Department indicated that this data would not be useful or practical on a day-to-day basis. However, they liked the idea in concept, but felt it would be too burdensome on the operators and on the Fire Department. Too many lines and operators exist within the Fire Department's jurisdiction which would translate into a large volume of notification data. If the data were to be supplied, it could provide the basis for statistical evaluation of pipeline safety regulations imposed by the Fire Department.</i>
Contra Costa County Fire Department	Assistant Fire Chief Argo (415) 447-6611	<i>The Contra Costa Fire Department indicated that notification data would be useless as an integral part of their day-to-day operations. Accepting the data is not so much a problem as is the <u>use</u> for the data. They do not see a "need-to-know" on such a routine basis. The need for product information is more useful at the occurrence of an event. They currently maintain contingency plans which have all the operator and pipeline information that is required.</i>